

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MERYL BRODSKY,

Plaintiff,

-against-

THE NEW YORK CITY CAMPAIGN FINANCE  
BOARD, ON BEHALF OF ZACHARY W. CARTER,  
CORPORATION COUNSEL OF THE CITY OF NEW  
YORK

Defendant.  
-----X

**DECLARATION OF  
AGNETHA E. JACOB IN  
SUPPORT OF MOTION  
TO DISMISS THE  
COMPLAINT**

17-CV-3186 (AJN) (JLC)

**AGNETHA E. JACOB** declares, under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, attorneys for Defendant New York City Campaign Finance Board in the above-captioned action. I submit this declaration in support of Defendant's Motion to Dismiss the Complaint.

2. Attached as Exhibit A is a copy of the Order dated July 9, 2010 issued by Justice Eileen Rakower in the state court action *Brodsky v. New York City Campaign Board*, No. I18316/06 (N.Y. Sup. Ct., July 9, 2010).

3. Attached as Exhibit B is a copy of Plaintiff's Complaint in the federal action *Brodsky v. Carter*, 15-CV-3469, 2015 U.S. Dist. LEXIS 169104 (S.D.N.Y. Dec. 15, 2015).

Dated: New York, NY  
August 17, 2017

ZACHARY W. CARTER  
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By: /s/ Agnetha E. Jacob  
Agnetha E. Jacob  
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